

# EXHIBIT A

1 UNITED STATES DISTRICT COURT  
2 EASTERN DISTRICT OF MICHIGAN

3 ALLSTATE INSURANCE COMPANY;  
4 ALLSTATE FIRE AND CASUALTY  
5 INSURANCE COMPANY; and ALLSTATE  
6 PROPERTY AND CASUALTY INSURANCE  
7 COMPANY,

8 Plaintiffs,

9 -vs-

10 C.A. No. 23-cv-10904-SKD-DRG

11 LINT CHIROPRACTIC PC; MI MEDICAL  
12 MANAGEMENT, LLC; DURAMED MI, LLC;  
13 SUPPLIES PLUS MI, LLC; DIAGNOSTIC  
14 CHIROPRACTIC MI, P.C.; EXCEL MEDICAL  
15 GROUP, PLC; AS MEDICAL GROUP, PLC; and  
16 ROBERT SUPER, D.C.,

17 Defendants.  
18 \_\_\_\_\_/

19 DEPOSITION OF

20 CORY T. BORAWSKI, D.C.

21 Taken by the Plaintiffs, on the 7th day of October, 2024, at  
22 38777 Six Mile Road, Suite 314, Livonia, Michigan, at 2:00  
23 p.m.  
24  
25

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1 was always in the back in the treatment room.

2 They'd sign in. They'd be like, "Cory, you've got a  
3 patient." Then I'd go grab them. I don't know.

4 BY MR. DENINNO:

5 Q You mentioned before we started that you had done a  
6 bunch of depositions for -- well, you said you had  
7 done a bunch of depositions via Zoom. About how  
8 many?

9 A Oh, boy. A rough estimate, more than 50, probably  
10 less than a hundred.

11 Q Have you ever seen any transcripts of your  
12 testimony?

13 A No.

14 Q Have you ever -- was all of those previous  
15 depositions pertaining to your treatment at Lint?

16 A All of them. Every single one. It was either for  
17 Diagnostic, what we talked about earlier for the  
18 range of motion, or for Lint for the NervoMatrix, or  
19 for the DME. It was one of the three.

20 Q How many employees did Lint Chiropractic have while  
21 you were working there?

22 MR. FINK: Objection. Foundation.

23 THE DEPONENT: Oh, I have no idea. I could  
24 tell you at least -- it fluctuated on the treatment  
25 side. I worked with a lot of people from the --

1 A I still had access to it. They knew all the e-mails  
2 and passwords because they were their account. So  
3 someone else could have used it. But I was the one  
4 that would primarily use it. Once I left, I never  
5 actually used it again. I never sent an e-mail from  
6 it or logged on. So someone could have used it.

7 Q What kind of -- who did you correspond with using  
8 that e-mail address?

9 A Really just Candice. Or Rob if I had a question and  
10 he wasn't getting back to me or something not super  
11 important I'd shoot him an e-mail. Really just  
12 Candice.

13 Q What would you and Candice correspond about?

14 A Well, I didn't know this was a thing. What Candice  
15 told me was, like -- like, there's Gmails you can  
16 pay extra and they can, like, encrypt it for, like,  
17 healthcare stuff so you can, like, send -- if I  
18 needed to say something about a patient or  
19 something.

20 So when we would use these -- remember, I  
21 told you the -- theirs didn't connect to the  
22 internet. So we'd get all this stuff on a flash  
23 drive. So at the end of the day, we'd take all the  
24 reports on the flash drive and then we would e-mail  
25 them to Candice.

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1                   So, actually, I guess a couple of people  
2           used that e-mail. Because the tech would use that  
3           e-mail to send the reports to Candice.

4       Q   Other than the lintchirodoc@gmail.com, are you aware  
5           of any other Gmail addresses that were used by Lint  
6           Chiropractic?

7       A   Candice's was lintbilling@gmail. That's all --  
8           that's the only two that I ever knew of and  
9           communicated with.

10      Q   What type of communications would you have with Mr.  
11           Geller by e-mail?

12                   MR. FINK: Objection. He's counsel to the  
13           company --

14                   MR. DENINNO: Oh, I'm sorry.

15                   MR. FINK: -- and attorney-client  
16           privilege.

17                   MR. DENINNO: Okay. I withdraw that  
18           question.

19                   MR. FINK: So don't --

20                   THE DEPONENT: Oh.

21                   MR. FINK: He's no longer employed. But,  
22           yeah, don't --

23                   THE DEPONENT: Oh, okay.

24                   MR. DENINNO: I withdraw the question. I  
25           knew that. But I did see him on the -- I'm sorry.

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CERTIFICATE OF NOTARY PUBLIC

STATE OF MICHIGAN )  
 ) SS  
COUNTY OF WAYNE )

I, Catherine M. Collier (CSR-1491), a  
Notary Public within and for the above county and state, do  
hereby certify that the foregoing deposition of CORY T.  
BORAWSKI, D.C. was taken before me on Monday, October 7, 2024,  
at 38777 Six Mile Road, Suite 314, Livonia, Michigan; that I  
recorded stenographically the foregoing deposition as was given  
by the above-named witness; that the stenographic notes were  
transcribed by me; and that said transcript here now appearing  
is true and correct.

I do further certify that I am not a relative or  
employee of or an attorney for any party or financially  
interested in the action.

*Catherine M. Collier*

Catherine M. Collier, CSR-1491  
Illinois License No. 084.004768  
Notary Public, Wayne County, Michigan  
My commission expires: October 29, 2029

Dated: October 14, 2024